

Col. Bedinger

(1)

28 Oct. 44

Letter g 4th December, 44

for 28th Oct - 3rd Nov. 44

28 OCTOBER 1947

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of  
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Tuesday, 28 October 1947  
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INTERNATIONAL MILITARY TRIBUNAL  
FOR THE FAR EAST  
Court House of the Tribunal  
War Ministry Building  
Tokyo, Japan

The Tribunal met, pursuant to adjournment,  
at 0930.

Appearances:

For the Tribunal, all Members sitting,  
with the exception of: HONORABLE JUSTICE R. B. PAL,  
Member from India, not sitting from 0930 to 1600.

For the Prosecution Section, same as before.

For the Defense Section, same as before.

(English to Japanese and Japanese  
to English interpretation was made by the  
Language Section, IMTFFE.)

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1                   MARSHAL OF THE COURT: The International  
2                   Military Tribunal for the Far East is now in session.

3                   THE PRESIDENT: All the accused are present  
4                   except SHIRATORI and TOGO, who are represented by  
5                   counsel. The prison surgeon at Sugamo certifies that  
6                   SHIRATORI is too ill to attend the trial today. The  
7                   certificate will be recorded and filed.

8                   With the Tribunal's permission the accused  
9                   TOGO will be absent from the courtroom for the whole  
10                  of the morning session conferring with his counsel.

11                  Major Blakeney.

12                  - - -

13                  R O K U Z O   T A K E B E ,   called as a witness on  
14                  behalf of the prosecution, resumed the stand  
15                  and testified as follows:

16                  CROSS-EXAMINATION

17                  BY MR. BLAKENEY (Continued):

18                  Q   I want to ask you a few questions about the  
19                  National Service Law of 1939, which is mentioned in  
20                  your original affidavit on page 4.

21                  The purpose of this law was to raise and train  
22                  a national Manchukuan army, wasn't it?

23                  A   I shall reply. The National Service Law was  
24                  enacted in 1939, whereas I didn't assume my post as  
25                  Director of the General Affairs Board of Manchukuo

1 until 1940, so I am not familiar with the circumstances  
2 in which this law was first enacted. The Manchurian  
3 national army was under the Kwantung Army, and the  
4 commander of the Kwantung Army had the power of com-  
5 manding that army.

6 Q I asked you about the purpose of the National  
7 Service Law of 1939. If you can answer it please do so.

8 A The National Service Law was enacted for the  
9 purpose of conscripting Manchukuoans in order to in-  
10 crease the strength of the Manchurian national army.

11 Correction: The National Service Law was a  
12 law enacted for the purpose of conscripting necessary --  
13 conscripting the strength required by the Manchurian  
14 national army.

15 Q What was the strength required every year?

16 A Although I don't know the exact number, I  
17 believe it was somewhere around 25,000.

18 Q What was the full number of men in the Man-  
19 chukuo national army?

20 A I believe it was around 70- to 80,000.

21 Q What was the period of service provided for  
22 the conscripts under the National Service Law?

23 A My recollection is that it was three years.

24 Q That is right. So in three years the entire  
25 soldier personnel of the army was turned over or

changed, wasn't it?

1 A Yes.

2 Q By the way, do you know that, as a matter of  
3 fact, although the theoretical term of service was  
4 three years, the period of actual active service was  
5 somewhat shorter?

6 A No, I didn't know that.

7 Q Did the National Service Law provide for  
8 inactive or reserve service by the conscripts after  
9 the expiration of their three-year term of active duty?

10 A At the time there was none.

11 Q Now, you mentioned the question of the supreme  
12 command of the Manchukuan army. It is a fact, isn't  
13 it, that under the provisions of that law, in peacetime  
14 the supreme command of the Manchukuo national army  
15 was in the Emperor of Manchukuo?

16 A From what I have heard the Emperor of Manchukuo  
17 did not have the power of the supreme command. That  
18 prerogative belonged to the commander of the Kwantung  
19 Army.

20 Q Where did you hear that?

21 A There was a secret treaty concluded between  
22 Manchukuo and Japan whereby the Emperor of Manchukuo  
23 delegated the power of the supreme command to the  
24 commander of the Kwantung Army.

25 Q What was the date of that treaty?

A I don't know the date of the signing of this  
1 treaty, but I believe it was in the early days of the  
2 founding of Manchukuo.

3 Q When did you see the treaty?

4 A I have never seen the original of the treaty  
5 itself, but I have heard about it.

6 Q Did you see a copy?

7 A No.

8 Q Who told you the contents of the treaty?

9 A The first time I heard of this treaty was when  
10 I had been appointed -- it was just after my appoint-  
11 ment as Chief of the General Affairs Board of Manchukuo.  
12 I called on Mr. YANAI at the Foreign Office and heard  
13 all this from him.

14 Q What did YANAI, Tsuneo tell you about it?

15 A He told me that there were a number of secret  
16 treaties, but among them was this one whereby the  
17 Emperor of Manchukuo delegated his power of the supreme  
18 command to the commander of the Kwantung Army.

19 Q Did you get the impression that it was a sepa-  
20 rate treaty dealing with the one subject of the supreme  
21 command of the Manchukuan army?

22 COLONEL IVANOV: Your Honor, in my submission,  
23 the question of the impressions of the witness has no  
24 bearing upon the issues and will not interest the

Tribunal.

1           THE PRESIDENT: By asking him his impressions  
2 you are only asking him what he thought.  
3

4           The objection is overruled.

5           THE INTERPRETER: The witness started to say,  
6 "I shall reply."  
7

8           I gained the impression that this was a separ-  
9 ate agreement concluded between Chief Executive Fu-Yi  
and General HONJO, commander of the Kwantung Army.  
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1 Q What were you told about whether that treaty  
2 provided that the Supreme Command of the Manchukuo Army  
3 in peacetime was under the Emperor?

4 A I didn't hear anything about that.

5 Q After the passage of the National Service Law  
6 in 1939, did the strength, the numerical strength, of the  
7 Manchukuo National Army increase?

8 A I am not aware of the circumstances around that  
9 time.

10 Q Around what time?

11 A Just before and after the passage of the Nation  
12 al Service Law.

13 Q Well, it was your duty, was it not, as Chief  
14 of the General Affairs of Manchukuo to enforce that law?

15 A The Manchukuo Government did cooperate in the  
16 matter of conscripting the recruits.

17 Q Didn't the Manchukuo Government keep the record  
18 showing what the strength of the army was at various  
19 times, both before and after the passage of this law?

20 A Of course I don't know, but I believe that the  
21 strength of the army was known from year to year.

22 Q What about the budget for military expenditures  
23 Did it show an increase or a decrease or did it stay the  
24 same after the passage of that law?

25 A The military -- budget for military

1 expenditures showed some increase from year to year.

2 Q How much is "some increase"?

3 A I am afraid I don't remember the extent of the  
4 increase.

5 C But you are quite sure there was an increase  
6 over 1938 in 1939 and subsequent years?

7 A Yes, I do know that.

8 Q Prices and other things in general rose during  
9 those years too, did they not?

10 A I believe they did.

11 Q Well, now, Mr. Witness, to shorten this, don't  
12 you know for a fact that the passage of the National  
13 Service Law in 1939 did not contemplate nor import any  
14 increase in the size of the armed forces of the Man-  
15 chukuo Government, but represented merely an effort to  
16 consolidate and rationalize the pre-existing military  
17 forces of and in the country?

18 COLONEL IVANOV: If your Honor please, the wit-  
19 ness has already replied that in 1939 he was not in  
20 Manchuria, and the information that he has already given  
21 to the questions asked by the defense do cover the  
22 matter.

23 MR. BLAKENEY: I don't think this witness re-  
24 quires any assistance whatever from counsel.

25 THE PRESIDENT: He did profess to have some

knowledge; he could not give figures, though. He is in  
a position where he should know what the budget expend-  
iture was, and that would be involved.

The question is allowed.

A May I have the question repeated, please?

(Whereupon, the last question was  
read by the Japanese court reporter.)

A (Continuing) Before the passage of the National Service Law, I believe the Manchurian National Army was -- the strength of the Manchurian National Army was recruited early by voluntary enlistment. By the passage of the National Service Law, young men who had reached a certain age were compulsorily recruited -- conscripted. This law therefore had the purpose of strengthening the Manchurian National Army.

I shall continue:

Therefore, the purpose of this law was to strengthen the Manchurian National Army, but I do not know as a matter of fact just whether or how much the Manchurian National Army actually increased around the year 1940.

THE INTERPRETER: Correction on the previous statement: "Since 1940" instead of "after 1940!"

The witness continued:

A The greatest increase in the strength of the

1 Manchurian Army was in 1943 or 1944, I forgot which.  
2 Around those years a plan for increasing the annual  
3 strength of the Manchurian National Army to 40,000 or  
4 45,000 was begun.

5 Q Increasing it to or by 40,000?

6 A The plan was to conscript 40 to 45,000 a year.  
7 Therefore, in three years, the army would be well over  
8 100,000.

9 C What was the actual strength of the Manchukuo  
10 Army by the beginning of the year 1945?

11 A Although I don't know for sure, I believe it  
12 was somewhere between 80 and 90,000.

13 C Do you know how much the strength of the Kwan-  
14 tung Army had been decreased by that time?

15 A That I do not know.

16 C Do you know what the strength of all forces in  
17 Siberia was at that time?

18 A I do not know.

19 C And yet you state in your affidavit, don't you,  
20 that the reason for the National Service Law was to have  
21 a large army for a war against the USSR? Do you really  
22 think this Manchukuo National Army of 80 to 90,000 was  
23 there to wage war against the USSR?

24 THE PRESIDENT: That is really a matter for  
25 comment. His answer won't help.

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1           MR. BLAKENEY: All right, we will pass that.

2       Q    So, as you understand it, the purpose of the  
3   National Service Law was to improve the quality of  
4   the personnel of the Manchukuo National Army; do I  
5   understand you correctly?

6       A    One of the purposes, I suppose, was to  
7   improve the caliber of the soldiers in the Manchurian  
8   National Army, but the purpose for improving the  
9   caliber was because a future increase in the total  
10   strength of the Manchurian National Army was envisaged.

11      Q    Who told you that?

12      A    I was not in Manchukuo in 1939 when the law  
13   was passed so what I am going to say is not the  
14   result of my own personal observation but that is  
15   what I felt. I do not know from my own personal  
16   knowledge but what I just told you was my own obser-  
17   vation.

18      THE PRESIDENT: In those circumstances his  
19   answer as he gives it will not be very helpful to us.  
20   He was not even a soldier.

21      Q    Mr. Witness, you have stated quite a few  
22   times that since you were not in Manchuria in the  
23   years immediately preceding 1940 you are not able to  
24   give factual answers in connection with matters  
25   occurring at that time. What I would like to know,

if that is so, is how you know what your predecessor  
in your post there was doing up to 1940, as you  
1 testify on page 4 of your errata affidavit, and how  
2 you know what the chiefs of staff of the Kwantung  
3 Army were doing during the years that you were not  
4 there, as you testify on the same page?

A To begin with, there were many orders  
6 addressed to my predecessors from the Kwantung Army  
7 which were in document form. I was able to learn  
8 of what he was doing from these.

Q Then, everything of that nature that you do  
10 know is something you learned from documents or from  
11 hearsay, is that so?

A Yes.

Q And when you talk about what those people,  
14 whom I have mentioned, endeavored to do, you are just  
15 giving your opinion, pure and simple, aren't you?

A Whom do you mean by these people? May I  
17 have that repeated?

THE PRESIDENT: We have enough information  
20 from him already to know on what he based those two  
21 last paragraphs.

On behalf of a Member of the Tribunal, I  
22 would like the witness to tell us what is the differ-  
23 ence between an offensive stand--

1           In your affidavit you make the following  
2 statement: "Until the Nomonhan Incident the Kwantung  
3 Army had taken an offensive stand towards the USSR,  
4 but after the above Incident, it changed to an atti-  
5 tude of aggressive defense." Will you please tell us  
6 the difference between an offensive stand and an atti-  
7 tude of aggressive defense?

8           THE WITNESS: I shall reply. Since I am  
9 neither an army man nor a military expert I am not  
10 fully conversant with military terms; however, it  
11 was my understanding that until the Nomonhan Incident  
12 the Kwantung Army was ready, should a positive oppor-  
13 tunity present itself, to take the offensive against  
14 the Soviet Union.

15           I became chief of the General Affairs Board  
16 of Manchukuo the year after the Nomonhan Incident.  
17 I think I can safely say that Japan suffered heavy  
18 losses in the Nomonhan Incident.

19           THE MONITOR: Went through bitter experience.

20           THE WITNESS (Continuing): The year after the  
21 Nomonhan Incident I went to Manchukuo to serve under  
22 General UMEZU and from UMEZU's attitude and expression  
23 and various talks which he made I gathered that, while  
24 he was prepared to take the offensive, the position  
25 taken by him was mainly that of defense.

I am afraid my explanation may become  
1 somewhat lengthy, but I should like to be permitted  
2 to add an explanation.

3 As I said yesterday in 1941 when the Kanto-  
4 kuen, the Kwantung Army special maneuver, was com-  
5 menced, I was afraid that war with Soviet Russia was  
6 imminent; and in August of the same year I went to  
7 Tokyo and met General TOJO and was there assured that  
8 war would not break out immediately. I learned of the  
9 Kantokuen in July, 1941, and I went to Tokyo in  
10 August.

12 TOJO told me that the Manchukuoan Government  
13 should cooperate with the Kwantung Army in carrying  
14 out the Kantokuen, but he did not tell me the real  
15 purpose of the Kantokuen itself. Even after my  
16 return to Manchukuo, Commander UMEZU did not offer  
17 me any special explanation. Therefore, I was forced  
18 into the position of arriving at my own conclusions  
19 regarding the purpose of the Kantokuen.

20 As regards what I learned of the Kantokuen,  
21 as I told you yesterday, since I am not a military man  
22 I did not know anything about the operational plans  
23 involved in that plan. All I was able to learn was  
24 by the demands which the Kwantung Army made to the  
25 Manchukuo Government in connection with that plan.

1 For instance, since the strength of the Kwantung Army  
2 was increased, new barracks were required, more food  
3 must be provided; also the Kwantung Army, in order to  
4 carry out its operational plans, must have railways,  
5 it must have roads, it must have airfields.

6 THE PRESIDENT: I think that we cannot hope  
7 to gain any further information on this point that  
8 will really be helpful.

9 THE WITNESS: May I continue my explanation?

10 THE PRESIDENT: No, the particular Member  
11 of the Court who asked you the question does not want  
12 to hear you further.

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1 Q Now, in your testimony you speak of the  
2 Fifth Section of the Kwantung Army Staff. What were  
3 the functions of the Fifth Section of the Kwantung  
4 Army Staff?

5 A The activities of the Fifth Section of the  
6 Kwantung Army were kept very secret, and, therefore,  
7 I have never heard directly from anyone in the Kwan-  
8 tung Army about what was being done in that section.  
9 But, as a matter of fact, there were some younger  
10 officials of the Manchukuoan Government who were  
11 helping in the research -- in the investigations being  
12 carried on by the Fifth Section. And, because of  
13 this, generally speaking, I was able to get the  
14 general picture of what the Fifth Section was doing.  
15 I heard from FURUJI, who was Vice-Director of the  
16 General Affairs Board, that the Fifth Section was  
17 concerned with matters such as the administration of  
18 occupied areas, the problems of banking, propaganda,  
19 and so forth in those occupied areas.

20 Q Is that all you heard about the functions of  
21 the Fifth Section?

22 A That is all I know about the Fifth Section.

23 Q What other functions it may have had you do  
24 not know.

25 A I don't know.

1 Q And when you state that it was engaged in  
2 studying occupational system for the territories of  
3 the Soviet Union, do you know whether it was also  
4 engaged in studying the questions of military govern-  
5 ment for territories other than those of the Soviet  
6 Union?

7 A I didn't know of that.

8 Q You say that this Fifth Section was organ-  
9 ized in the summer -- no, I am sorry: in 1941.

10 A That is my recollection.

11 Q And how long did it continue to exist, until  
12 the end of the war?

13 A I don't believe it continued quite that  
14 long.

15 Q Well, until when do you think it continued?

16 A I don't remember for sure, but I believe by  
17 1943 it had already been dissolved.

18 Q Were you told by the young officials of the  
19 Manchukuo Government why it was dissolved?

20 A No.

21 Q Were these young officials of the Manchukuo  
22 Government the leading officials whom you mention  
23 in your affidavit?

24 A By "leading Japanese officials" I meant out-  
25 standing officials who were a little more than young.

1           Q   I see. Now, you have a good deal to say in  
2 your affidavit about the Kyowakai, and you mention  
3 in connection with it Lieutenant General LIYAKE.  
4 What was his position in the Kyowakai?

5           A   General LIYAKE was Chief of the Central  
6 Headquarters of the Kyowakai.

7           Q   From what date?

8           A   According to my recollection, it was from  
9 the end -- around the end of 1940.

10          Q   Do you know who selected him for appointment  
11 to that position?

12          A   I think it was the Kwantung Army.

13          Q   Why do you think so?

14          A   The Kwantung Army had, from before, di-  
15 rected the activities -- had from before controlled  
16 the Japanese officials in the Kyowakai.

17          Q   Now, you know as a matter of fact that  
18 General LIYAKE was selected by the Prime Minister of  
19 Manchukuo, who was also President of the Kyowakai,  
20 don't you?

21          A   The President of the Kyowakai was the Prime  
22 Minister of Manchukuo, and as far as form went the  
23 Chief of the Central Headquarters was appointed by  
24 the President of the society. However, in actuality,  
25 Prime Minister Chang had no voice in the selection of

1 officers, and it is natural that the commander of the  
2 Kwantung Army had the final say in selecting the  
3 Chief of the Central Headquarters.

4 Q Well, now, let's just leave out of the ques-  
5 tion what is natural, and you tell me whether you  
6 don't know as a fact that Prime Minister Chang Ching-  
7 hui made the selection of General LIYAKE for this  
8 position in December, 1940.

9 COLONEL IVANOV: If your Honor please, the  
10 witness has already replied in substance to this  
11 question exposing the technique of the Japanese ad-  
12 ministration in Manchuria. The prosecution objects  
13 to a new question though this reply may not suit my  
14 learned colleague.

15 THE PRESIDENT: Let him answer.

16 A I shall do so. Well, of course, it is Chang  
17 Ching-hui who actually appoints the chief of the  
18 Central Quarters. But, in reality, I think it is  
19 closer to the truth to say that the chief of the  
20 Central Headquarters was appointed by the commander  
21 of the Kwantung Army.

22 Q Well, I think you're playing on words. You  
23 know the difference between select and appoint. Now,  
24 is your answer, no, he was not selected by the Prime  
25 Minister of Manchukuo?

1                   THE PRESIDENT: He has already said in  
2 effect that he was not selected by the Prime Minister.  
3 His appointment was really nominal or as a matter of  
4 course as far as the Prime Minister was concerned.  
5 I think we have all come to the conclusion we are  
6 not likely to get much assistance from any further  
7 cross-examination along these lines, Major Blakene.

8 Q     Mr. witness, what were the purposes and  
9 what was the object of the Kyowakai?

10       A     Well, since I was not in Manchukuo at the  
11 time of the founding of the Kyowakai, I can't tell  
12 you of the purpose for which the society was founded.  
13 The real, final objective of the Kyowakai was to im-  
14 plant the Japanese spirit, the so-called spirit of  
15 Japan, in the hearts of the peoples inhabiting  
16 Manchukuo.

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Q Were you an official of the Kyowakai?  
A Yes.  
Q What office did you hold in it?  
A I was a member of the Central Headquarters Committee.  
Q During the entire period of your service?  
A Yes.  
Q What was the membership of the Kyowakai during those years?  
A Well, it was stated that there were over four million, but as a matter of fact I think that the actual membership was very difficult to ascertain.  
Q By the way, do you know where General MIYAKE is now?  
A I believe he is in Soviet Russia. I learned of that through reading a Russian newspaper.  
Q Recently?  
A No, it was quite some time ago.  
Q About how long ago?  
A I don't recall for sure, but it must have been at least over half a year.  
Q Have you seen him during the time you have been interned in the U.S.S.R.?  
A No.  
Q Can you read Russian?

1 A No.

2 Q What sort of newspaper did you read about him  
in?

3 A Among those who are interned together with  
4 me are many who can read and understand Russian. Those  
5 people read the newspaper to me.

6 Q What was the information about General MIYAKE  
7 something over half a year ago?

8 THE PRESIDENT: What is the point of that  
9 question, Major Blakeney? I could understand you  
10 wanting to find out his whereabouts, you might want  
11 to subpoena him.

12 MR. BLAKENEY: If the Tribunal please, I  
13 would rather not state the point in the presence of  
14 this witness.

15 THE PRESIDENT: What point is there in asking  
16 what was read to him from a Russian paper?

17 MR. BLAKENEY: I have a point which I think  
18 very valid but which I would rather not state in the  
19 presence of the witness. And I request prosecution  
20 counsel not to state it for me in the presence of the  
21 witness.

22 COLONEL IVANOV: Your Honor, at this stage  
23 of the trial this is a question that will by no means  
24 interest the Tribunal. But if Mr. Blakeney is

1 interested in this question he may clear it up in the  
2 course of his work with the witness when he becomes a  
3 defense witness.

4 THE PRESIDENT: Well, counsel must convince  
5 us, of course, that his question is relevant and  
6 material. We can't allow counsel to say: "Well, I  
7 can't tell you. Let me ask the question first." Unless  
8 you tell me the reason for the question, or give me  
9 some indication, I don't propose to allow it, unless  
10 my colleagues think otherwise.

11 I am taking it is objected to. I think that  
12 is the sum total of what Colonel Ivanov said.  
13

14 MR. BLAKENEY: I thought the case was an  
15 exact parallel to that arising a few days ago when the  
16 prosecutor was told that he need not disclose his hand  
17 to the witness.

18 THE PRESIDENT: This question hasn't arisen  
19 before.

20 MR. BLAKENEY: Well, I will leave it.  
21  
22  
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1 BY MR. BLAKENEY (Continued):  
2

3 Q Was General MIYAKE at one time a staff officer  
4 of the Kwantung Army?  
5

6 A I think he was chief of staff.  
7

8 Q At what time was that? Do you know?  
9 A Around the time of the Manchurian Incident.  
10

11 Q And he retired from active service and returned  
12 to Japan a good many years ago, didn't he?  
13

14 A I think that was so.  
15

16 Q Do you know when he retired?  
17 A I don't know.  
18

19 Q After his retirement and return to Japan was  
20 he an officer of the Kwantung Army at all?  
21

22 A Are you asking me whether he ever subsequently  
23 became an officer in the Kwantung Army?  
24

25 Q Yes.  
26

27 A I don't think he did.  
28

29 Q In fact, he couldn't have, being retired, could  
30 he?  
31

32 A I know nothing of such matters.  
33

34 Q At any rate, during the time that he was chief  
35 of the Central Headquarters of the Kyowakai he wasn't  
36 an officer attached to the Kwantung Army at all, was he?  
37

38 A No, he wasn't.  
39

40 Q Do you know that according to evidence before

1 this Tribunal General MIYAKE died on the 23rd of October,  
2 1946?

3 A When did he die? May I have the date repeated?

4 THE PRESIDENT: Do you know whether he is dead  
5 or not?

6 THE WITNESS: I do not know.

7 Q Now, at the time you took appointment as Chief  
8 of General Affairs of the Government of Manchukuo, was  
9 it your purpose to go to Manchuria to prepare for war  
10 against the U.S.S.R.?

11 A No, I did not go to Manchukuo with war as my  
12 objective.

13 Q And what was your purpose in accepting that  
14 position and going to Manchuria?

15 A I have been to Manchukuo two times, one in 1935  
16 and the second time in 1940. The first time I went  
17 I was Chief of the Kwantung Bureau -- correction: the  
18 first time I went there I was first Chief of the Policy  
19 Section of the Kwantung Bureau and subsequently I  
20 became Chief of the Kwantung Bureau, but that time I  
21 was an official of the Japanese Government. The second  
22 time I became Director of the General Affairs Board and  
23 this position was that of an Manchukuoan official. To  
24 which position does your question refer?

25 Q I said when you accepted the post of Chief of

### General Affairs in Manchukuo.

A When I went to Manchukuo, Manchukuo had been established for the purpose of cooperating with Japan in establishing a new order and I felt that the big purpose was to bring up Manchukuo so that it could become a truly independent nation. Especially since the Manchurian Incident Manchukuo was considered as Japan's lifeline and I felt that it was indeed an important task to defend Manchuria and to develop Manchukuo as a sound and healthy state and it was with that thought in mind that I accepted the post.

2 THE PRESIDENT: We will recess for fifteen  
3 minutes.

(Whereupon, at 1045, a recess was taken until 1100, after which the proceedings were resumed as follows:)

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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE WITNESS: May I continue my reply?

4 This is in continuation of what I was saying  
5 before the recess. As I said, Manchukuo was Japan's  
6 lifeline and must be maintained at all costs, and also  
7 Manchukuo was where the Kwantung Army was, which was  
8 preparing for war against -- for operations against the  
9 Soviet Union. Since I felt that there was great sig-  
10 nificance in aiding this important task as Chief of  
11 the General Affairs Board, when I was approached by  
12 General UMEZU to assume this post I accepted.

13 BY MR. BLAKENEY (Continued):

14 Q Now, you said your purpose in going was to  
15 help in building up Manchukuo into a sound and healthy  
16 country, or words to that effect. Did the building up  
17 of a sound and healthy country in Manchukuo not require  
18 that conditions of the people of Manchukuo be improved?

19 A Yes.

20 Q In fact, the standard of living was raised  
21 considerably during your tenure, was it not?

22 A I am of the opinion that conditions in Man-  
23 chukuo improved from year to year.

24 Q Education became more widespread?

25 A The number of those receiving secondary

1 education increased considerably and universities  
2 and other institutes of higher learning also in-  
3 creased.

4 Q Sanitary conditions were improved?

5 A Yes, they were.

6 Q The condition of the farmers and of agri-  
7 culture also improved?

8 A The quantity of agricultural products in-  
9 creased from year to year, and I also believe that  
10 the conditions of the farmers themselves improved  
11 bit by bit.

12 Q The various social services for improvement  
13 of the conditions of the poor and so forth were greatly  
14 expanded, were they not?

15 A Yes, they were expanded.

16 Q Even to some extent medical facilities and  
17 services were improved, weren't they?

18 A Medical facilities were greatly expanded and  
19 improved.

20 Q You worked for those aims, did you not?

21 A Those were one of my objects.

22 Q You achieved results which you justly felt  
23 pride in, didn't you?

24 A I do admit that during my tenure of office  
25 conditions in Manchuria improved, but I have no

1 intention of boasting about my own achievements,  
2 or taking pride in them.

3 Q. But to you those purposes were more or less  
4 important than the purpose of preparing for aggres-  
5 sion against the USSR?

6 A. The preparation for operations vis-a-vis  
7 the Soviet Union and the improvement of conditions  
8 in Manchukuo are both sides of the same medal, and  
9 you cannot separate them.

10 Q. In carrying out those objects which we have  
11 been discussing, improving the status of the country  
12 and of its residents, you were encouraged, were you  
13 not, by the commanders-in-chief of the Kwantung Army  
14 under whom you served?

15 A. What do you mean by encouragement? I under-  
16 stand now. Yes, I was encouraged and exhorted by the  
17 Commander of the Kwantung Army.

18 Q. Where have you been interned since you were  
19 captured by the Soviet forces?

20 A. I was first captured by the Soviet forces  
21 in Hsinking, and then was in Chita for some time; and  
22 then for a short period of time I was sent to  
23 Khabarovsk. Recently I have been living on the  
24 outskirts of Moscow until my return to Japan.

25 Q. Have you been treated as a prisoner of war

1 During this period?

2 A I was treated as a civilian internee.

3 Q Was your treatment equivalent to that of  
4 prisoners of war officers?

5 A Yes; of course, not exactly the same; that  
6 is to say, we are not receiving any salary.

7 Q Have you been tried for any war crime or  
8 offense against the USSR?

9 A No.

10 Q Have you been charged with any such crime  
11 or offense?

12 A No.

13 Q Are you aware of having been under investi-  
14 gation on any such charge -- charge or suspicion?

15 A I don't know.

16 Q Have you been imprisoned at any time during  
17 your stay in Soviet custody?

18 A Yes, I have.

19 Q For how long a period?

20 A From January 25, 1945 to May 30 of the same  
21 year; for about four months I was in the first prison  
22 in Khabarovsk.

23 Q You don't mean 1945, of course?

24 A It was last year; so it should be 1946.

25 Q From January until May?

1 A Until May 30.

2 Q During that time your affidavit was taken  
3 for use in this trial, wasn't it?

4 A Yes.

5 Q That affidavit is dated the 26th of March,  
6 1946, is it not?

7 A Yes.

8 Q When did you become a prisoner of the  
9 Soviet forces?

10 A It was on the 27th of September, 1945.

11 Q Do you know any reason why you have not  
12 been repatriated to Japan?

13 A I don't know.

14 MR. BLAKENEY: That concludes my cross-  
15 examination, but other counsel will cross-examine on  
16 behalf of particular defendants.

17 THE PRESIDENT: Mr. Blewett.

18 MR. BLEWETT: If the Tribunal please, I wish  
19 to cross-examine on behalf of the defendant TOJO.

20 CROSS-EXAMINATION (Continued)

21 BY MR. BLEWETT:

22 Q In your amended affidavit of 20 October 1947,  
23 you refer, in paragraph 5, to a visit during the summer  
24 of 1941 to Prime Minister TOJO. Now, did you write  
25 that statement out in your own hand?

1           A    May I see my affidavit for a moment?

2           Q    Well, this is just a few days ago that you  
3         made out this affidavit. You certainly should remember  
4         whether you wrote it out or not.

5           A    I do remember having written the affidavit,  
6         but I have a feeling that you ask me now whether or  
7         not I met Prime Minister TOJO, and it was War Minister  
8         TOJO that I met. Aren't you referring to War Minister  
9         TOJO?

10          Q    No, I asked you whether you wrote this affi-  
11         davit out in your own hand?

12           THE PRESIDENT: He said he did.

13          A    I wrote it in my own hand.

14          Q    Now, where did this conversation take place?

15          A    At the War Ministry.

16          Q    On what date?

17          A    I forgot the date.

18          Q    Who was present at the time?

19          A    I believe I met with TOJO just by myself.

20           I believe that only two of us were in the room.

21

22

23

24

25

Q Was the purpose of your visit to him a social  
call or an official visit?

3       A It was not a personal visit. I went there  
4 in order to find out something in the line of my offi-  
5 cial duties.

6 Q Well, now, you know that he was not the Premier  
7 at that time as you stated just a few moments ago,  
8 don't you?

9 Yes.

Q At least, I assume that this visit took place before October 1941?

A Yes, I believe it was in August that I visited him.

4 Q Did you have an opportunity of reading over and  
5 correcting this affidavit after it was prepared?

6        A     I did not feel there was any necessity of  
7 making corrections.

Q But still you tell us now that at the time  
you knew that TOJO was not Premier at the time, but  
you referred to him as Premier.

A I should like to be permitted to see my  
affidavit.

4 MR. BLEWETT: Will the Captain please hand  
5 the witness the affidavit, the one of October 20?

(Whereupon, a document was handed

1 to the witness.)

2 Q It is paragraph 5.

3 A I shall reply. I recall that it was in  
4 August of 1941 that I went to Tokyo and, therefore,  
5 the words I used, "Prime Minister TOJO" is a mistake,  
6 and it should be corrected to "War Minister TOJO."  
7 I don't know what the procedure is in such cases, but  
8 I should like to ask that the words "Prime Minister  
9 TOJO" appearing in paragraph 5 of my affidavit be cor-  
10 rected to "War Minister TOJO."

11 Q Well, now, did it occur to you, when you were  
12 reading over this affidavit, that it might be a vital  
13 matter to correct that mistake?

14 A When I reread my affidavit, I just let this  
15 matter pass without thinking of it at all.

16 THE MONITOR: Without noticing it.

17 Q I also call your attention to paragraph 2  
18 of your later affidavit, in which you refer to page 11  
19 of the Japanese text. Now I will ask you if there is  
20 a page 11 in your Japanese text?

21 That is your first affidavit. Do you have  
22 that?

23 A I believe that my first Japanese affidavit  
24 does have a page 11. That is why I was asking for a  
25 correction.

1 Q Well, now, I will ask you if, in fact, you  
2 wrote this affidavit, or if it is not a fact that it  
3 was written for you?

4 A In drawing up this affidavit, I had a con-  
5 ference with Colonel Ivanov. The first and second  
6 points were written on my desire. In regard to points  
7 subsequent to point 3, these were written in reply --  
8 these are my replies to Colonel Ivanov's questions.  
9 A Russian stenographer was present. She took down my  
10 replies in Russian. These were retranslated back into  
11 Japanese, and that is the final form in which my  
12 affidavit appeared.

13 Q Now, are there any further inaccuracies here  
14 that you would like to correct for the Tribunal?

15 A As I have told you, other than the phrase  
16 "Prime Minister" -- words "Prime Minister," I believe  
17 there are none at present.

18 Q Did you look at your Japanese text of your  
19 first affidavit, and is there a page 11 in that affi-  
20 davit? What is the last numbered page?

21 A The affidavit I saw, the Japanese affidavit  
22 I saw, was not the one I wrote in my own handwriting,  
23 but the typed copy.

24 THE PRESIDENT: Have you much of this sort  
25 of thing? Otherwise, it isn't worth wasting time on

TAKEBE

## CROSS

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it.

MR. BLEWETT: I am willing to pass on, sir.

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1       Q Now, this conversation you had with  
2 War Minister TOJO, did he not speak to you at that  
3 time regarding administrative matters concerning  
4 his specific position as the Minister of State?

5       A General TOJO told me as representative  
6 in my position as Chief of the General Affairs  
7 Board of the Manchukuo Government, representing  
8 the Manchukuo Government, that the Manchukuo  
9 Government should give all possible aid to the  
10 furtherance of the Kantokuen plans which was to  
11 enforce -- which would enforce the Kwantung Army --  
12 reinforce the Kwantung Army.

13      Q But I believe you testified here that  
14 your main purpose in taking an airplane and going  
15 to Tokyo was to inquire of War Minister TOJO  
16 whether or not there was to be a war with the U.S.S.R.,  
17 is that not right?

18      A Yes.

19      Q And he told you "not so."

20      A Yes.

21      Q Now, in the last paragraph of your affidavit  
22 of October 20 you referred to TOJO as Chief of the  
23 Kwantung Army Staff and that he endeavored to carry  
24 out military measures directed against the Soviet  
25 Union. What is the basis of your statement?

1       A   At the time I was in Manchukuo and I  
2       was General Director of the Kwantung Bureau. That  
3       is why I know about it. It is natural that the  
4       Chief of Staff of the Kwantung Army should endeavor --  
5       should exert his endeavors in connection with military  
6       operations against the Soviet Union.

7       Q   Now, do you not mean by that statement  
8       that the Chief of Staff merely carried out the  
9       ordinary duties pertaining to his position?

10      A   I can't understand your purport. May I  
11      have it repeated, please?

12                     (Whereupon, the Japanese court  
13                     reporter read.)

14      A   (Continuing) I think there is no doubt  
15      about the fact that the Chief of Staff as his  
16      duties exerted his efforts in connection with  
17      operations against the Soviet Union.

18      Q   And those operations, as you have explained  
19      to us very fully, were **purely** defensive, were  
20      they not?

21      A   I believe that the term "purely defensive"  
22      is somewhat insufficient, because that term always  
23      carried an implication that the Kwantung Army was  
24      always ready to take the offensive.

25      Q   Well, take the meaning that you gave us as

1           defensive. These plans in the main were operational,  
2           were they not?

3           COLONEL IVANOV: The witness has previously  
4           replied in the course of the cross-examination  
5           by the defense that he is not familiar with the  
6           operational plans of the Kwantung Army. I object  
7           on the ground that this question is repetitive. The  
8           answer to this question has been already given.

9           MR. ELEWETT: I am satisfied with the  
10          reply to the previous answer, your Honor.

11          That will be all the cross-examination,  
12          if the Court please.

13          DR. TAKAYANAGI: I should like to conduct  
14          cross-examination for the defendant SUZUKI, Teiichi.

15           CROSS-EXAMINATION (Continued)

16          BY DR. TAKAYANAGI:

17          Q      I should like to cross-examine you, Mr.  
18          Witness, in reference to paragraph 2 of this  
19          affidavit in which you stated: "Naturally, at the  
20          present time I do not remember the exact wording  
21          of ARAKI's and SUZUKI's statements, as many years  
22          have elapsed since then."

23          A      Yes, I did state that.

24          Q      And then you go on to state, do you not,  
25          that the purport, the main purport, of ARAKI's --

1 Then you go on to state, referring to ARAKI's and  
2 SUZUKI's statement and say that the main purport  
3 of ARAKI, Sadao's statement as follows.

4 A Yes.

5 Q Did you write down this statement with  
6 sufficient care and are there any corrections  
7 necessary?

8 THE INTERPRETER: "I take it that you have  
9 no need for further corrections as I suppose you  
10 have written this part of your affidavit with all  
11 due care."

12 THE PRESIDENT: Do not ask him questions  
13 like that. Do ask him something substantial.

14 Be sure to say "Yes."

15 DR. TAKAYANAGI: Yes.

16 That was a preliminary question and I shall  
17 go into substance now.

18 THE PRESIDENT: Dispense with preliminary  
19 questions.

20 Q You state in your affidavit, page 1 of the  
21 English text, that "The gist of ARAKI's address was  
22 that Japan had brought about the Manchurian Incident,  
23 established the State of Manchukuo..." and so forth.  
24 Now, it seems to me that this is entirely different  
25 from the official interpretation of the Japanese

1           Government at that time. Do you think -- Now,  
2           don't you think it is so?

3           A. It has been said that the establishment  
4           of Manchukuo was based upon the unanimous will of  
5           the thirty million people inhabiting Manchukuo.  
6           But since the Manchukuo Incident it has become  
7           clear that it was Japan that established Manchukuo,  
8           and therefore I adopted the expression that Japan  
9           established Manchukuo because actually that is  
10          what Japan did.

11          Q. Then, what you have written is not the  
12          purport of what ARAKI said, but it is your own  
13          observation, is it not?

14          A. Well, I wrote the purport of what General  
15          ARAKI said without bothering about the minor  
16          details -- the specific details. What I meant  
17          when I said that I wrote the gist of ARAKI's  
18          address is just that.

19  
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1 Q Well, however, from the wording of the  
2 affidavit it seems that this is what ARAKI actually  
3 said, but the fact is not so, is it?

4 A There is no mistake in that. I did express  
5 ARAKI's thoughts.

6 Q Then it follows, does it not, that the  
7 statement of the War Minister was entirely differ-  
8 ent from the official interpretation -- official  
9 statement of the Japanese Government at that time?

10 THE MONITOR: "Statement of War Minister  
11 ARAKI."

12 COLONEL IVANOV: If your Honor please, the  
13 counsel of SUZUKI is now conducting the cross-  
14 examination on behalf of the defendant ARAKI. We  
15 would not object to this cross-examination if we knew  
16 that he is authorized to do so, but if he is conduct-  
17 ing this cross-examination at his own desire, we do  
18 object to it.

19 DR. TAKAYANAGI: My position in asking this  
20 question is that my question has an important bearing  
21 on the credibility of that affidavit, and therefore  
22 it has an important bearing upon the accused SUZUKI.  
23 Therefore, I am asking this question.

24 THE PRESIDENT: Well, I do not think that  
25 is sufficient ground actually. If we do apply that

test, there is no question that we would disallow.

The objection is upheld.

ARAKI's counsel can effectively cross-examine, if necessary.

DR. TAKAYANAGI: I have failed to mention that I have been authorized by the accused ARAKI with the consent of his counsel to ask this question in his behalf.

THE PRESIDENT: One counsel cannot transfer his responsibility to another without the concurrence of the Court.

DR. TAKAYANAGI: Then, could I not get that permission?

THE PRESIDENT: No, we have refused it previously. There is no good ground for granting such permission.

DR. TAKAYANAGI: Then, I shall discontinue the question concerning the accused ARAKI, and I shall ask you from a different aspect.

Q You state in your affidavit that the Conference, namely, the Conference of the Prefectural Governors was held at the great auditorium of the Toyoma Military School in Tokyo. Was it not very unusual?

A I think there were other instances where

the Conference of Prefectural Governors was held in  
1 the auditorium of the Toyoma Military School. I  
2 have attended other conferences which were also held  
3 in this auditorium.

4 Q Was it not held ordinarily in the cabinet?

5 A Well, it was a custom that on the day on  
6 which the Prefectural Governor's Conference was  
7 opened the Premier would make a speech opening the  
8 Conference at the cabinet, but then on the following  
9 days sessions were held at the various ministries.  
10

11 Q Do you know an organization known as the  
12 Servicemen's Assistance Association?  
13

14 A I am afraid I don't know very well of that  
society.  
15

16 Q Can you name -- can you state the names of  
17 a few Prefectural Governors who attended the Confer-  
18 ence on the same day and listened to the addresses  
of War Minister ARAKI and SUZUKI?  
19

20 A Well, there are almost fifty Prefectural  
21 Governors in all, but among the Governors, those of  
22 Prefectures near me, were, for instance, Governor  
23 ISHIGURO of Iwate Prefecture, Governor AKAGI of  
24 Miyagi Prefecture, and Governor ISHIWARA of Yamagata  
Prefecture.  
25

Q Do you remember whether Mr. KOSAKA, Yasumasa

attended at this Conference as a Prefectural Governor?

1 A I don't recall.

2 Q Do you not mean the statement -- was the  
3 statement which you alleged to have been made by the  
4 War Minister and SUZUKI at the meeting of the Prefec-  
5 tural Governors actually the address made by them  
6 that you heard at a meeting of the Servicemen's  
7 Assistance Association where you were invited to  
8 attend?

9  
10 A No, that is not so. This was at a session  
11 of the Prefectural Governor's Conference, and it was  
12 held in the auditorium of the Toyoma Military School,  
13 half as a secret meeting.

14 Q Were there not the maps of Manchuria and  
15 the Soviet Union in the great auditorium?

16 A Yes.

17 Q Is there no mistake in that?

18 A No.

19 DR. TAKAYANAGI: That is all.

20 THE PRESIDENT: Is there any further cross-  
21 examination?

22 MR. BLAKENEY: That appears to be all, your  
23 Honor.

24 THE PRESIDENT: Well, I have questions on  
25 behalf of one of the Members of the Tribunal.

1 BY THE PRESIDENT:

2 Q Why were you imprisoned by the Russians?

3 A I know of no reason why I was imprisoned.

4 Q Who made the order of imprisonment?

5 A On the 24th of January, last year, Lieutenant  
6 General Dolgikh, Chief of the Internal Affairs Bureau  
7 of Khabarovsk State, told me that I was to be im-  
8 prisoned, and on the following 25th I was taken by  
9 the major, who was in charge of the internment camp  
10 where I was interned, to the prison.

11 THE PRESIDENT: Colonel Ivanov, will there  
12 be any re-examination?

13 COLONEL IVANOV: Yes, your Honor. I'd  
14 like to start my redirect examination after the  
15 recess.

16 THE PRESIDENT: We will adjourn until half  
17 past one.

18 (Whereupon, at 1200, a recess was  
19 taken.)

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## 1                   AFTERNOON SESSION

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3                   The Tribunal met, pursuant to recess, at 1330.4                   MARSHAL OF THE COURT: The International Mili-  
5                   tary Tribunal for the Far East is now resumed.

6                   THE PRESIDENT: Colonel Ivanov.

7                   R O K U Z O T A K E B E, called as a witness on  
8                   behalf of the prosecution, resumed the stand and  
9                   testified through Japanese interpreters as follows:

## 10                  REDIRECT EXAMINATION

11                  COLONEL IVANOV: I am starting the redirect  
12                  examination of the witness TAKEBE.

13                  BY COLONEL IVANOV:

14                  Q     Mr. Witness, answering the questions put by  
15                  defense counsel, you said that the Japanese troops were  
16                  stationed in Manchuria for the purpose of self-defense.  
17                  However, realizing these defensive aims, they had to  
18                  take the offensive position, and further, that after  
19                  1944 theirs was a purely defensive stand. Is that so?

20                  A     It is as you say.

21                  Q     Thus, in your first affidavit and in the  
22                  course of the cross-examination, you drew a distinction  
23                  between defense and what you call pure defense, did you  
24                  not?

25                  A     When I said "defense" I meant a defense that

1 included offense to a certain extent. The word "defense"  
2 can be said to have a very broad meaning, and for  
3 example, the occupation by Japan of Manchuria was also  
4 called defense.

5 Q Do I understand you correctly, that the term  
6 "defense" known to you included the occupation of  
7 territories of other countries by Japan? Is that so?

8 A When I say "defense with an offensive atti-  
9 tude" that is what I mean.

10 Q The working out of conditions of occupation  
11 regime on Soviet territories in which work the Kwantung  
12 Army headquarters was engaged was also included in the  
13 term "defensive stand" of the Kwantung Army of 1941 and  
14 1942, is that right, and as you said about this in  
15 your affidavit and in your reply to the defense counsel?

16 A I shall reply. That was also included.

17 Q General UMEZU was Commanding General of the  
18 Kwantung Army at that time, was it so?

19 A Yes, it was General UMEZU.

20 Q Mr. Witness, answering the questions put by  
21 defense counsel, you said that when the war broke out  
22 between the USSR and Germany, the strength of the Soviet  
23 troops in the Far East somewhat decreased, is that so?

24 A Yes, I so testified.

25 Q Tell us, witness, did the strength of the

1 Kwantung Army increase considerably after the outbreak  
2 of the Soviet-German war?

3 A Yes, it was increased.

4 Q Were not the changes in the strength of the  
5 Soviet troops and the increase of the strength of the  
6 Kwantung Army connected with the difficult position of  
7 the Soviet Union at the beginning of the Soviet-German  
8 war?

9 MR. BLAKENEY: That is objected to as calling  
10 for a conclusion of the witness, and of course leading,  
11 like all of his questions.

12 THE PRESIDENT: Colonel, you have been leading  
13 all throughout, and he is your witness and you are not  
14 supposed to lead him until he is declared hostile.  
15 He does not appear to be hostile.

16 We will have to allow the objection on that  
17 ground.

18 COLONEL IVANOV: I will change the form of my  
19 question, then.

20 Q Has the situation at the Soviet-German front  
21 in that period of time any significance with regard to  
22 the changes in the strength of Soviet troops and the  
23 Kwantung Army, and what was that situation for the Soviet  
24 Union?

25 MR. BLAKENEY: I object to that question as

1 calling for the witness' conclusion in a matter in which  
2 he is ignorant and in which his opinion could not assist  
3 the Tribunal.

4 THE PRESIDENT: I don't think that technical  
5 military knowledge is required to answer a question like  
6 that. The objection is overruled and the question  
7 allowed.

8 A I am sorry; I wasn't able to get the meaning  
9 of your question. Please repeat it.

10 COLONEL IVANOV: Will the Japanese court re-  
11 porter repeat the question, please?

12 (Whereupon, the last question was  
13 read by the Japanese court reporter.)

14 A (Continuing) Well, I think that the war situation  
15 of the Soviet-German war was very unfavorable for the  
16 Soviet Union. I have no sufficient knowledge of how that  
17 affected the relative strengths of the Soviet and Kwan-  
18 tung Armies.

19 Q The construction of strategic railways and  
20 highways, fortified areas, airfields, barracks, and  
21 other military objectives was carried on in accordance  
22 with the instructions given annually by the Commander of  
23 the Kwantung Army, was that so?

24 THE PRESIDENT: That is leading, Colonel. I  
25 told you you can't do that. We have not allowed any

1 other counsel to do it. We cannot make any exceptions.

2 COLONEL IVANOV: I will change the form of  
3 this question, if the Tribunal please.

4 Q Was the construction of strategic railways and  
5 highways, fortified areas, airfields, barracks, and other  
6 military objectives, carried out or not in Manchuria,  
7 in accordance with the instructions by the Kwantung  
8 Army?

9 THE INTERPRETER: Correction, please: In-  
10 stead of "railways and airfields, military objectives,"  
11 insert "military objectives."

12 MR. BLAKENEY: I object to that question as not  
13 arising in any way out of cross-examination.

14 THE PRESIDENT: It is also leading, as permitting  
15 of the simple answer of yes or no.

16 It is very difficult to say what is or what  
17 is not within the scope of this affidavit. It is  
18 everruled on the ground that it is leading. The ques-  
19 tion is disallowed on the ground that it is leading.

20 Colonel, in re-examination, as I understand it,  
21 the re-examining counsel confines himself to clearing up  
22 matters which are left obscure or not sufficiently ex-  
23 plained during the course of cross-examination.

24

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1                   COLONEL IVANOV: If your Honor please, I  
2 submit that the question of the construction of a  
3 strategic base in Manchuria has not been made  
4 sufficiently clear in the course of the cross-examina-  
5 tion by the defense who conducted this cross-examina-  
6 tion on this particular point. I would like to ask  
7 only one question on this particular point.

8                   Q In your reply to the defense you stated that  
9 numerous military objectives were being constructed  
10 in Manchuria. Tell us, Witness, do you know on the  
11 border with what state these military objectives were  
12 being constructed?

13                  A They were built on the Soviet-Manchurian  
14 border.

15                  Q Answering the questions put by defense counsel,  
16 you said that in accordance with UMEZU's instructions  
17 the compulsory mobilization of labor took place. Was  
18 it so?

19                  MR. BLAKENEY: I object to that question on  
20 the ground that there is no mention whatsoever in  
21 cross-examination of compulsory mobilization of labor.

22                  COLONEL IVANOV: I am prepared to make this  
23 question clear as the defense desires. I will change  
24 the term "compulsory" labor to simply labor -- mobiliza-  
25 tion of labor.

1                   THE PRESIDENT: The objection is on the  
2 ground that it does not arise out of the cross-examina-  
3 tion, and I don't recollect that it does.

4                   COLONEL IVANOV: If your Honor please, the  
5 witness has repeatedly mentioned this measure taken  
6 in Manchuria in accordance with the instructions of  
7 General UMEZU, especially yesterday during the cross-  
8 examination by the defense counsel. However, the de-  
9 fense did not trace this measure up to the results to  
10 which this measure led.

11                  THE PRESIDENT: Well, none of us feels that  
12 anything was left obscure or requires explanation in  
13 that regard.

14                  Q Tell us, Witness, did the population of Man-  
15 churia approve of the compulsory mobilization of labor  
16 and the measures for the mobilization of labor -- of  
17 manpower?

18                  MR. BLAKENEY: That is objected to as im-  
19 material and as not arising out of anything touched upon  
20 in the cross-examination.

21                  THE PRESIDENT: Objection upheld.

22                  COLONEL IVANOV: If your Honor please, may  
23 the witness be shown the Japanese translation of ex-  
24 hibit 731-A?

25                  (Whereupon, a document was handed

1 to the witness.)

2 Q Mr. Witness, have you read at my request the  
3 Japanese translation of exhibit 731-A?

4 A Yes, I did.

5 Q Do you know the facts mentioned in this ex-  
6 hibit?

7 MR. BLAKENEY: If the Court please, that  
8 question is objected to as importing new matter not  
9 arising out of the cross-examination.

10 THE PRESIDENT: I will ask the court reporter  
11 to repeat it; I was reading a cablegram when it was put.

12 (Whereupon, the last question was  
13 read by the official court reporter.)

14 MR. BLAKENEY: The witness is now being asked,  
15 apparently, to confirm some statements of fact con-  
16 tained in some other exhibit introduced by the prosecu-  
17 tion, which in no way arises out of any of his testimony  
18 here.

19 THE PRESIDENT: What have you to say, Colonel?

20 COLONEL IVANOV: Your Honor, I had no oppor-  
21 tunity to ask this question and to submit and to pro-  
22 duce this exhibit in the course of my direct examina-  
23 tion -- to ask the witness this question and to pre-  
24 sent this document to him. I ask the permission of the  
25 Court to be allowed to do so in my redirect examina-

1 tition. Furthermore, the defense has devoted much  
2 attention to the question of Kyowakai during the  
3 cross-examination. I submit that the asking of this  
4 question is justified by these considerations.

5 MR. BLAKENEY: This document went into evi-  
6 dence on the 11th of October, 1946, which is some-  
7 thing over one year ago.

8 THE PRESIDENT: Permission is refused by a  
9 majority.

10 Q Witness, in reply to the questions put by the  
11 defense counsel you stated that during several months  
12 in 1946 you were imprisoned in Khabarovsk. Were you  
13 interrogated during that period of time?

14 A May I have the stenographic record repeated,  
15 please?

16 (Whereupon, the last question was  
17 read by the Japanese court reporter.)

18 A (Continuing) I shall reply.

19 During that period I was interrogated by the  
20 head of the Khabarovsk branch of the Ministry of Inter-  
21 nal Affairs of the Soviet Union.

22 Q Were you or were you not charged with any  
offense?

23 A I was unable to get it clearly over the micro-  
phone. Please repeat it.

(Whereupon, the last question  
was read by the Japanese court reporter.)

A (Continuing) No, I was not told that I was charged with anything.

5           Q    " That was the result of these interrogations?  
6   Were you set free?

7       A As I told the Tribunal this morning, I was not  
8 told the reason for which I was put into prison, but I  
9 suppose that some suspicion had been cast upon my  
10 activities while in Manchuria, and that I was put into  
11 prison in order to be investigated regarding those  
12 activities by the authorities. This investigation was  
13 carried on for quite a long time, but at the end of  
14 four months I was released, and so I thought all sus-  
15 picion has been cleared.

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1       Q   Were you interrogated on March 26, 1946,  
2 by Colonel Baginyan, the military investigator of the  
3 USSR at the International Military Tribunal for the  
4 Far East?

5       A   Yes, I was interrogated.

6       Q   Did the interrogating officer state to you  
7 his position and did he tell you that you were being  
8 interrogated as a witness in the case of the Japanese  
9 major war criminals?

10      A   Yes, I was told. That part is supposed to be  
11 attached to my affidavit. I think you will find it  
12 there.

13      Q   Was the interrogation conducted in or out-  
14 side the prison?

15      A   The interrogation was conducted in the  
16 building of the Khabarovsk branch of the Soviet  
17 Ministry of Internal Affairs and it was not conducted  
18 in the prison.

19      THE PRESIDENT: I do not think that any  
20 Member of the Tribunal wants you to investigate the  
21 circumstances under which the interrogation was made.

22      COLONEL IVANOV: I would like to ask only  
23 one last question, may it please the Court.

24      Q   Were you or your testimony, given on March 26,  
25 1946, influenced by the fact that you at that time

1 were kept in prison at Khabarovsk?

2 A No, that had nothing to do with my attitude.

3 COLONEL IVANOV: Your Honor, the defense  
4 asked some questions concerning page 11, which was  
5 mentioned in his additional affidavit. I want to  
6 make it clear to the Tribunal that the witness in  
7 the course of the drawing of the additional affidavit  
8 was using a processed copy of his first affidavit in  
9 the Japanese language. In the processed copy the  
10 questions mentioned by the witness are on the 11th  
11 page of the affidavit of the Japanese text.

12 THE PRESIDENT: That is enough because  
13 Mr. Blewett abandoned that line of examination at  
14 the Court's suggestion.

15 COLONEL IVANOV: I would like to refer the  
16 Tribunal to the transcript pages where excerpts of  
17 exhibit 670 were introduced. Excerpts from this  
18 exhibit were on the following transcript pages:  
19 7330, 7581--7586, 7598--7600, 8078--8080. The ex-  
20 cerpts introduced by the defense are on transcript  
21 pages 23,278 and 23,183.

22 If there are no additional questions to the  
23 witness may he be excused on the usual terms?

24 THE PRESIDENT: I have a question on behalf  
25 of a Member of the Tribunal:

1 Did the Russian colonel who interrogated  
2 you tell you that you were to be a witness or an  
3 accused before this Tribunal?

4 THE WITNESS: Was this question, your  
5 Honor, addressed to myself?

6 THE PRESIDENT: Addressed to you, yes.

7 THE WITNESS: I was not told that I was to  
8 be one of the accused. After my arrival in Tokyo  
9 I was told that I might be a witness.

10 THE PRESIDENT: Yes, that is sufficient.

11 MR. BLAKENEY: It is understood, of course,  
12 that the releasing of the witness on the usual terms  
13 includes his being made available to the defense for  
14 consultation in accordance with the agreement of this  
15 morning in Chambers.

16 THE PRESIDENT: There is no need to ask for  
17 any assurance, Major.

18 GENERAL VASILIEV: That is quite true, your  
19 Honor.

20 THE PRESIDENT: He is excused on the usual  
21 terms.

(Whereupon, the witness was excused.)

24 COLONEL IVANOV: I now call the prosecution  
witness MATSUURA, Kusuo.

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MATSUURA

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1 K U S U O M A T S U U R A , called as a witness on  
2 behalf of the prosecution, being first duly  
3 sworn, testified through Japanese interpreters  
4 as follows:

5 DIRECT EXAMINATION

6 BY COLONEL IVANOV:

7 Q Will the witness state his first and last  
8 name?

9 A My name is MATSUURA, Kusuo.

10 Q How old are you?

11 A I am thirty years old -- I am thirty-one.

12 Q Are you at present a prisoner of war of the  
13 Soviet Army?

14 A Yes.

15 COLONEL IVANOV: May the witness be shown  
16 exhibit 833?

17 Q Witness, is that your affidavit and did you  
18 sign it? .

19 A This is my affidavit and I have signed it.

20 Q Did you testify without any duress?

21 A I made my testimony without any duress.

22 Q Are all the statements contained in your  
23 affidavit true and correct?

24 A They are true and correct; however, in one  
25 part of my affidavit I made a mistake in the name of

1       one person so I should like to correct that name.

2       Q     Tell us what name did you state incorrectly  
3           and how should it be properly read?

4       A     On page 8 of the Japanese text, page 4 of  
5           the English text, line eleven, "Major AOSHIMA  
6           Ryoichiro, senior army intelligence staff officer,"  
7           should be corrected to "Major NAKANISHI, Masujiro,"  
8           of the same rank.

9       Q     Any other changes?

10      A     No, no other corrections.

11      COLONEL IVANOV: With the Court's permission  
12           I will put two additional questions to the witness.

13      Q     Was the Kwantung Army staff engaged in the  
14           working out of the occupation administration system  
15           for the Soviet territories?

16      A     In August, 1943, when I assumed my post in  
17           the Kwantung Army headquarters the then chief of the  
18           code section, Major KOBAYASHI, made the following  
19           explanation to me, namely, that under the Kantokuen  
20           plan a fifth section had been added to the staff of  
21           the Kwantung Army headquarters and that this fifth  
22           section was occupied with the investigation of the  
23           administration of occupied areas. When I assumed my  
24           post this fifth section was no longer in existence,  
25           but there was an officer and a few other men who were

engaged in what they called disposing of the  
1 remaining business of that section.

2 Q Who was the commanding general of the  
3 Kwantung Army at that time?

4 A General UMEZU, Yoshijiro.

5 COLONEL IVANOV: Your Honor, certain  
6 excerpts from exhibit 833 were read into the record  
7 both by the prosecution and by the defense. The  
8 excerpts read by the prosecution are to be found at  
9 pages 8087--8089, 8173--8174; the excerpts read by  
10 the defense are to be found at pages 23,276, 23,277.  
11 That is all.

13 The defense may now cross-examine the  
14 witness MATSUURA, Kusuo.

15 THE PRESIDENT: Major Blakeney.

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## CROSS-EXAMINATION

1 BY A.R. BLAKENEY:

2 Q Witness, what was the date of the Anti-  
3 Comintern Pact and the Tripartite Alliance?

4 THE PRESIDENT: Why are you asking him that?

5 A.R. BLAKENEY: Because he refers to it on  
6 page --

7 THE PRESIDENT: It is an admitted fact be-  
8 fore the Court.

9 A.R. BLAKENEY: I am testing his memory.

10 THE PRESIDENT: We cannot turn this into a  
11 quiz session voluntarily.

12 A.R. BLAKENEY: This man has made many ex-  
13 tremely broad statements tending to implicate many  
14 of these defendants, including some on this point  
15 which I am now mentioning which you will find on page  
16 6 of his affidavit.

17 THE PRESIDENT: Colonel Ivanov.

18 COLONEL IVANOV: I object to this question  
19 as being without the scope of this affidavit, and I  
20 should also like to object to the statement made at  
21 the lectern by the defense counsel as being improper.

22 THE PRESIDENT: He is purely a soldier, as  
23 far as I can judge, and he shouldn't be asked questions  
24 about what are really political events.

1           MR. BLAKENEY: Then he shouldn't have testified to them. If I may continue the demonstration of  
2           how it is material, I think it is perfectly plain.  
3           This man states that certain things occurred, certain  
4           things which are charged here as part of a campaign  
5           of preparation of aggression against the USSR, and he  
6           fixes that time -- and I am referring to the second  
7           paragraph from the bottom of page 6 of his affidavit --  
8           as being at the time of the conclusion of the Anti-  
9           Comintern Pact and the Triple Alliance. And I do  
10          think that by any rule I must have the right to find  
11          out whether he knows when that time was.

12           THE PRESIDENT: We want questions that will  
13          be really directed to elicit useful answers. Let him  
14          answer. The objection is overruled. Let him answer  
15          to save time, but we will see what help we are going  
16          to get. Let us have a demonstration of the value of  
17          these things.

18           A      May I have the question repeated, please?  
19           A      Explain it again, please.

20           Q      What was the date of the Anti-Comintern  
21          Pact and the Triple Alliance between Japan, Germany  
22          and Italy?

23           A      I have no clear recollection of the date.

24           Q      Then how do you know that certain Japanese

MATSUURA

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propaganda toward the USSR took place at that time?

A My affidavit -- I do not think my affidavit contains any reference to specific propaganda.

Q Do you know what is in your affidavit?

A Yes, I do.

Q Who wrote your affidavit?

A I wrote it myself.

Q How long since you've seen your affidavit?

A It was on May 18 of last year when I signed it.

Q You haven't been shown it since you've been in Japan, or a copy of it?

A I did see a copy.

Q When?

A Immediately after my arrival, that is to say, on the 16th of October.

Q Are you a graduate of the Japanese Army Staff College?

A No.

Q Therefore, you were not eligible ever to occupy staff positions, were you?

A That is so.

Q You are quite sure that the Japanese Kwantung Army was planning aggression against the Soviet Union during 1941 to '45, aren't you?

1                   COLONEL IVANOV: The prosecution objects to  
2 the question being put in such form by the defense  
3 counsel. I am referring to the using of the term  
4 "aggression" in the question.

5                   THE PRESIDENT: I cannot see that it is  
6 objectionable on that ground. The objection is  
7 overruled. He is cross-examining counsel and can  
8 make suggestions.

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1 Q You are quite sure of that, aren't you?  
2 A What do you mean by what I said before?  
3 Q I say you are quite sure, aren't you, that the  
4 Japanese Kwantung Army was planning aggression against  
5 the Soviet Union during the years from 1941 to 1945?  
6 A As is written in my affidavit, I knew of this  
7 because I had been told of it from specific persons.  
8 Q Now, in that plan for war against the Soviet  
9 Union the plan known as the Kantokuen was quite an  
10 important factor, was not it?  
11 A Yes.  
12 Q Kantokuen means Kwantung Army special maneuvers,  
13 doesn't it?  
14 A Yes.  
15 Q However, according to your testimony the  
16 Kantokuen applied also to the Mongolia Army and the  
17 Korea Army, didn't it?  
18 A No, that isn't so.  
19 Q It didn't apply to either of those?  
20 A I don't believe it applied to the Mongolia  
21 Stationary Army or to the Korean Army.  
22 Q Well, now, just a moment and I will read you  
23 something from your affidavit which you apparently have  
24 never read. Did you give this answer in your affidavit,  
25 top of page 6?

1 A May I have the affidavit?

2 Q Just a minute. I haven't read it to you yet.

3 COLONEL IVANOV: I am supporting the request  
4 made by the witness to give him an opportunity to see  
5 for himself what is written in his affidavit -- what is  
6 contained in his affidavit.

7 THE PRESIDENT: We will undertake to see that  
8 nothing in his affidavit is misrepresented.

9 COLONEL IVANOV: Well, I would like you to take  
10 into account that the affidavit was drafted in the  
11 Japanese language and not in English and the defense  
12 counsel is going to read it in English.

13 THE PRESIDENT: It will be repeated in Japanese  
14 to the witness.

15 Q Did you or did you not give this answer in your  
16 affidavit as follows --

17 THE PRESIDENT: I doubt the validity of this  
18 method of approach anyhow. Has he contradicted anything  
19 that he said in his affidavit yet?

20 MR. BLAKENEY: Yes, sir. He has just at this  
21 moment told me that the Kantokuen did not apply either  
22 to the Mongolian Stationary Army or the Korean Army.

23 THE PRESIDENT: Well, you can refer us to any  
24 different statement in his affidavit. We don't want you  
25 to have an argument with him about it.

1                   MR. BLAKENEY: Well, if I cannot put the contradic-  
2 diction to the witness, I will refer the Tribunal to the  
3 first answer at the top of page 6, which has not been  
4 read in evidence, by the way, and to the last paragraph  
5 but one from the bottom of page 4, also not read into  
6 evidence, in which the witness directly contradicts his  
7 present testimony concerning the Korea Army.

8                   THE PRESIDENT: That will save time.  
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1                   COLONEL IVANOV: Your Honor, it doesn't follow  
2 from the Russian text of this affidavit what has been  
3 stated here by Mr. Blakeney.

4                   RUSSIAN MONITOR: From the Russian transla-  
5 tion of this affidavit.

6                   COLONEL IVANOV: I suppose the Language Sec-  
7 tion will make it clear for us with regard to the three,  
8 to all the three copies of this affidavit.

9                   THE WITNESS: I should like to be permitted  
10 to make an explanation on that point.

11                  THE PRESIDENT: The Language Section will  
12 make it clear as far as regards the Japanese text.  
13 We have no Russian language section.

14                  MR. BLAKENEY: The English text, of course,  
15 is official.

16                  BY MR. BLAKENEY (Continued):

17                  Q When did you go to the Kwantung Army?

18                  A From August 1943 to August 1945.

19                  Q Before going to the Kwantung Army for some  
20 time you were with the Mongolia Expeditionary Army,  
21 weren't you?

22                  A Yes, I was with that army for about two years  
23 and a half.

24                  Q The Mongolia Occupation Army, of course, was  
25 under the command of the China Expeditionary Army,

wasn't it?

A Yes.

Q No connection whatever in the chain of command with the Kwantung Army, was there?

A No connection in the chain of command.

Q And the Korea Army also was an independent army not under the command of the Kwantung Army?

A That is so.

Q During all this period, from approximately 1940 to 1945, you were a sort of cipher clerk, first in the Mongolia and then in the Kwantung Army, weren't you?

A Yes.

Q And your responsibilities were only that of cipher work, weren't they?

A Yes. As far as my duties went, that is so.

Q Now, did the Kantokuen Plan pass through your hands in cipher form to be deciphered by you?

A No, not the Kantokuen.

Q Did you ever see the Kantokuen Plan?

A No, never.

Q Such things were rather on the secret side, weren't they?

A Yes, just as you said.

Q They weren't confided to just every officer,

but only to officers whose duties had some connection  
1 with them, isn't that so?

2 A Yes, of course.

3 Q In fact, mostly very high ranking officers?

4 A Well, even if they were not high ranking  
5 officers, if they had duties in connection with that  
6 plan they would know about it.

7 Q All right. Now, all you really know about  
8 the Kantokuen Plan is what you were told about it by  
9 some captains and majors long after it went into effect,  
10 isn't it?

11 A I can't understand the meaning of your ques-  
12 tion. May I have it repeated, please?

13 THE PRESIDENT: We will recess for fifteen  
14 minutes.

15 (Whereupon, at 1445, a recess was  
16 taken until 1500, after which the proceedings  
17 were resumed as follows:)

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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Major Blakeney.

4 BY MR. BLAKENEY (Continued):

5 Q Now, my last question before the recess,  
6 which you found it difficult to understand, was this:

7 Is it not a fact that all you knew about the  
8 Kantokuen was what you were told about it by some  
9 captains and majors long after it went into effect?

10 A Just as you say. However, those who told me  
11 of this plan were those who in the line of duty knew  
12 of the plan then and knew of it later.

13 Q All right. We will come to that later.

14 Now, these informants of yours told you, didn't  
15 they, that under the Kantokuen, two new area armies  
16 had been organized under the jurisdiction of the Kwan-  
17 tung Army?

18 A Yes.

19 Q Did the organization of those two new area  
20 armies mean that additional divisions, corps, armies,  
21 were brought into the Kwantung Army, or did it mean  
22 only a reorganization of the then existing forces in  
23 the Kwantung Army?

24 A Well, I don't know which it meant.

25 Q Do you know, in fact, whether the strength of

1           the Kwantung Army was or was not increased as a result  
2           of the Kantokuen Plan?

3           A     Not in detail.

4           Q     Now, what did the Mongolia Occupation Army do  
5           under the Kantokuen?

6           A     The Mongolia Stationary Army had nothing to  
7           do directly with the Kantokuen Plan; but as an army  
8           directly connected with the Kwantung Army, it was  
9           increasing its strength.

10          Q     How much?

11          A     Well, from 40,000 in 1941 it increased to  
12          about 70,000 in 1943.

13          Q     What preparations were made by the Mongolia  
14          Stationary Army according to the Kantokuen to open hos-  
15          tilities against the Soviet Union?

16          A     Various preparations.

17          Q     Name them.

18          A     First, the conference of corps commanders.  
19          Second, the suspension of release of soldiers who had  
20          completed their term of duty. Third, the conversion  
21          of cavalry into mechanized units. Fourth, the investi-  
22          gation of the Feisuantaiku desert district on the spot.

23           Those are some of them.

24          Q     Who were these corps commanders?

25          A     The head of the army, Commander of the Army,

1       was Lieutenant General AMAKASU, Jutaro; the Commander  
2       of the 26th Division, Lieutenant General SHIBAYAMA,  
3       Kenshiro; Lieutenant General BABA, Seiro, Commander  
4       of the Cavalry Units; Major General MANO, Goro, Com-  
5       mander of the Second Independent Mixed Brigade.

6       Q   When was that meeting?

7       A   Around the 5th of July, 1941.

8       Q   Only one such meeting during the time you  
9       served in the Mongolia Occupation Army?

10      A   There were conferences held later also.

11      Q   Give the dates.

12      A   I don't remember the exact dates, but the  
13     conferences were held on the whole about once a year.

14      Q   How do you happen to remember the date of the  
15     earlier one and not the dates of the later ones?

16      A   Well, the first conference was held immediately  
17     after the outbreak of the German-Soviet War, and it  
18     left quite an impression on my mind. That is why I  
19     still remember it.

20      Q   Why do you call that the first one? Do you  
21     mean one was not held in the year before?

22      A   Of course, I believe there was.

23      Q   Of course they were held every year. Does  
24     that mean they were planning aggression against the  
25     Soviet Union every year?

A No, that does not follow.

Q Have you told us now all that the Mongolia  
Occupation Army did in the way of preparations accord-  
ing the the Kantokuen?

A I can't understand the meaning of your question.  
May I have it repeated?

Q The meaning of my question is, have you now  
told to the Tribunal all of the things which you spoke  
of in your affidavit as being preparations made by the  
Mongolia Stationary Army according to the Kantokuen  
Plan for attack against the U.S.S.R.?

COLONEL IVANOV: Your Honor, in reply to the  
question asked by the defense counsel, the witness has  
quite positively stated that the Kantokuen Plan had  
no connection whatsoever with the measures taken by  
the Japanese Army in Inner Mongolia. However, the  
defense counsel, in formulating his question, is  
persistently pointing out that the measures taken in  
Inner Mongolia were conducted under the Kantokuen Plan.

I do not know whether such questions are  
admissible in an international court, but in our Soviet  
courts such questions are inadmissible, both with  
regard to the examination of the accused and examina-  
tion of the witnesses.

MR. BLAKENEY: I have been very careful to use

1                   the exact words of the affidavit each time I have put  
2                   that question.

3                   THE PRESIDENT: If there is any assumption  
4                   of facts, it is based on the affidavit?

5                   MR. BLAKENEY: That is correct.

6                   THE PRESIDENT: Objection overruled.

7                   MR. BLAKENEY: And I might say that the wit-  
8                   ness seems to have no trouble in knowing what I am  
9                   talking about.

10                  Q     Do you remember my last question?

11                  A     Yes, I do.

12                  Q     Answer it.

13                  A     I knew that the strength of the Mongolia  
14                  Stationary Forces had been increased from July 1941  
15                  to December of the same year by the addition of 5,000  
16                  new troops. I also know that Staff Officer KOTANI,  
17                  of the Kwantung Army, came to our army in September,  
18                  1941, as liaison officer, which fact I didn't mention  
19                  yet here.

20                  Q     What was that?

21                  A     Which fact I haven't mentioned here yet.

22                  THE MONITOR: I have failed to testify to  
23                  that effect.

24                  Q     Are those all the points, then?

25                  A     Yes.

1           Q   Did the Kantokuen provide for the time of  
2         the aggression against the U.S.S.R.?

3           A   I don't believe the time of attack had been  
4         decided on. I have heard nothing concerning this.

5           Q   The Kantokuen, you say, was effective during  
6         1942 and 1943. What do you mean by "effective"?

7                 The last line on page 4.

8           A   By the term "effective" I meant that the  
9         Kantokuen Plan had been carried over to 1942 and 1943.

10          Q   You mean that the same plan for aggression  
11         contained in the Kantokuen of 1941 continued to be  
12         the plan for aggression of 1942 and 1943?

13          A   Yes.

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1           Q   I am especially interested in these large-  
2 scale maneuvers which were held in accordance with  
3 the Kantokuen in Manchuria and Korea from August 1941  
4 onwards. Will you tell me more about those maneuvers,  
5 please?

6           A   I do not have sufficient knowledge concerning  
7 the maneuvers which were held after August 1943.

8           Q   I didn't mean to say 1943; if I did it  
9 was an error. After August 1941?

10          A   It was in August of 1943 that I assumed my  
11 post.

12          Q   I understand that, but in your affidavit you  
13 say: "According to the Kantokuen, large-scale maneuvers  
14 were put into practice in Manchuria by the Kwantung  
15 Army since August 1941. It was so also with the Korea  
16 Army in Korea" (bottom of page 4). Now, I want to  
17 know about those maneuvers.

18          A   Before replying to your question I should  
19 like to make a short explanation.

20          Q   No, I think you had better give me your  
21 answer and you can make your explanation some other  
22 time. Tell us about the maneuvers.

23          A   I do not know in detail about the maneuvers  
24 which were carried on up to July 1943. I do know,  
25 however, that in August 1943 a river-crossing operation

1        -- maneuvers in crossing rivers were conducted near  
2        Tsitsihar. Furthermore, in the winter of 1943  
3        operations to withstand the cold were carried on with  
4        one division as a unit near Chamussu.

5        Q      Of course, all those things you are talking  
6        about now were all just ordinary, normal, routine,  
7        annual maneuvers, weren't they?

8        A      Of course, they were annual maneuvers, but I  
9        believe that they were operations -- maneuvers carried  
10       out in training, to train the troops for operations  
11       under the Kantokuen after the various units of the  
12       army had been reorganized under the Kantokuen plan.

13       Q      Now, when you wrote in your affidavit that  
14        large-scale maneuvers were put into practice in Manchu-  
15       ria by the Kwantung Army since August 1941, did you  
16       know what you meant or didn't you?

17       A      Of course, I did know about it, but what I  
18        have written in my affidavit here was the explanation  
19        given to me by Major KOBAYASHI, Chief of the Code  
20       Section, and I have written it down just as he  
21       explained it to me. I believe that you will under-  
22       stand that what I have written here is an explanation  
23       of what Major KOBAYASHI explained to me. I don't  
24       think that you understand that.

25       Q      I will worry about my understanding now, and

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1 you will just answer the questions, please. Did you  
2 see any maneuvers in Manchuria at any time?

3 A Yes, I have.

4 Q When?

5 A The maneuver which I saw myself was in  
6 August of 1943, the river-crossing operation near  
7 Tsitsihar, which took place in August 1943.

8 Q What troops were engaged in that maneuver?

9 A I don't recall the number of the unit, but  
10 I remember that it was composed -- the whole number  
11 of troops was composed of three divisions, approx-  
12 imately.

13 Q How many troops had been engaged in maneuvers  
14 in the preceding year?

15 A I don't know.

16 Q Well, in short, do you know whether there  
17 was anything unusual in the scale of these maneuvers  
18 in August of 1943?

19 A It is as you say.

20 Q Of course, you never saw any maneuvers in  
21 Korea, did you?

22 A No, I never have.

23 Q So what you know about these large-scale  
24 maneuvers is what you were told by some captain --  
25 no, he was a major -- some major, isn't it?

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A Yes.

1 Q Did he tell you the details of the large-  
2 scale maneuvers held in Manchuria and Korea as the  
3 result of the Kantokuen plan from August 1941?

4 A He did not explain the details to me.

5 Q Now, the Kantokuen plan, I believe, provided  
6 for the Mongolia Occupation Army's advance into the  
7 Zabaikal or Transbaikal area as part of the war plan,  
8 didn't it?

9 A I heard of that from Captain HATTORI.

10 Q But was that provided in the Kantokuen plan  
11 of 1941.

12 A That I do not know.

13 Q At any rate, you never heard of it until you  
14 were gossiping with some captain in Tokyo in the  
15 middle of -- in 1944, did you?

16 A Captain HATTORI was in the Cipher Section of  
17 the Kwantung Army at the time of this Kantokuen plan.

18 Q That wasn't my question. Repeat the question  
19 to him.

20 A I heard of this from Captain HATTORI, but I  
21 heard of it in a conversation which I had direct with  
22 Captain HATTORI.

23 Q In Tokyo, in 1944?

24 A No, that is not so.

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- 1           Q   When was it?  
2           A   In the beginning of December 1943.  
3           Q   All right, December 1943, in Tokyo. That is  
4           right?  
5           A   Yes.  
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1 Q And, did this captain tell you at that time  
f  
2 that the plan for the advance of the Mongolian  
&  
3 Occupation Army into the Transbaikal area was part  
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4 of the Kantokuen plan?  
r  
5 A No, he didn't say it was part of the plan.  
6 Q Well, what did he say about it?  
7 A He told me that simultaneously with the  
8 Kwantung Army's operations under -- commencement of  
9 operations under the Kantokuen plan the Mongolian  
10 Stationary Army would begin its advance to the  
11 Baikal through the Republic of Outer Mongolia, that  
12 that was the plan.

13 THE MONITOR: "It was scheduled, too."

14 Q At any rate, whatever the plan was you  
15 never -- it was never known to you in 1941 when you  
16 were with the Mongolian Army, was it?

17 A I didn't know anything about it then.

18 Q Do you know a man, SEJIMA, Ruizo, a lieuten-  
19 ant colonel, who testified for the prosecution here  
20 that he participated in the drawing up of army plans  
21 for the Japanese general staff?

22 A Yes.

23 Q Do you know that he testified here that the  
24 operations plans for 1941 included no advance into the  
25 Transbaikal area?

1           COLONEL IVANOV: This is outside the scope  
2 of the affidavit and the cross-examination. On this  
3 ground the prosecution is objecting to this question.

4           THE RUSSIAN MONITOR: He said, "It is  
5 immaterial and has no bearing upon the issues in this  
6 case, and it is outside the scope of the examination  
7 in chief," instead of "cross-examination."

8           MR. BLAKENEY: I think it has some bearing  
9 on this witness' credibility.

10          THE PRESIDENT: It would be sufficient for  
11 you to point out in your summation the view of the  
12 other man, Major Blakeney. I think it is only a  
13 waste of time asking these questions of these people  
14 in this way. It is quite common enough to tell a  
15 witness that another person has a different view  
16 and does he accept that, but I do not think any  
17 advantage is to be gained by trying it here.

18          Q Now, in June, 1941, you saw some orders  
19 relating to the principles of preparations for  
20 operations.

21          A Yes, I did.

22          Q Did you ever see the principles themselves?

23          A No.

24          Q Do you know the contents of those principles  
25 of preparations for operations?

1 A No, I did not.

2 Q Didn't any of your captain friends tell you?

3 A They have.

4 Q Well, tell us.

5 A Major MINAI, Ichiro, who was then an intelligence officer attached to the intelligence section  
6 of the army told me that the objective of the Mongolian  
7 Stationary Army, in case of attack, would be Ulanbator  
8 and Zabaikal.

10 THE MONITOR: "And the same army will  
11 launch an offensive in that direction."

12 THE INTERPRETER: "Will assume an offensive  
13 position."

14 A (Continuing) And that its mission was to cut  
15 the Trans-Siberia Railway, and to make it difficult  
16 for the Soviet Union to transport supplies to the  
17 Far East.

18 Q Is that all he told you about it?

19 A That is all he told me.

20 Q And, he was a major in the intelligence  
21 section?

22 A He was a captain.

23 Q But, in the intelligence section?

24 A Yes.

25 Q Of the Mongolian Occupation Army?

A Yes, of the Mongolian Stationary Army.

1 Q Well, was it customary in the Mongolian  
2 Occupation Army for intelligence officers to know  
3 about operations plans?

4 A I don't think you can call it usual.

5 Q Have you ever been an intelligence officer?

6 A No.

7 Q Have you ever been an operations officer?

8 A No.

9 Q There is some little distinction between the  
10 two functions, isn't there?

11 A Yes, of course.

12 Q Now, as stated in your affidavit, you think  
13 that those principles of preparations for operations  
14 had something to do with the preparation of a war  
15 against the U.S.S.R., don't you?

16 A Yes, that is what I say.

17 Q And, I understand by the explanation you  
18 gave, this is proved by a number of facts which you  
19 mentioned and which I wish to examine a little..

20 Now, first, there was the visit of Lieutenant-  
21 Colonel KOTANI in September, 1941. He was an  
22 officer of the Kwantung Army staff, wasn't he?

23 A Yes.

24 Q But, he came to your Mongolian Occupation

1 Army for liaison purposes?

2 A Yes.

3 Q And, you knew those facts by reason of  
4 having deciphered the message announcing his impend-  
5 ing arrival?

6 A Yes, as you say.

7 Q And, he did come, didn't he?

8 A Yes.

9 Q And, he had a meeting with the commander of  
10 the Mongolian Army?

11 A Yes.

12 Q You, however, weren't present at the meeting?

13 A Of course not.

14 Q You didn't know what was said or talked  
15 about at the meeting?

16 A Of course I didn't.

17 Q In fact, this time you weren't even told by  
18 any captain what they talked about, were you?

19 A No.

20 Q But, you assume that it had to do with plans  
21 for aggression against the U.S.S.R., don't you?

22 A I gained the impression from the war situ-  
23 ation between Germany and Russia and also from the  
24 general atmosphere then prevailing.

25 Q And, that is one of the facts from which you

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1       drew the conclusion that the principles of preparation  
2       for operations had to do with the commencement of  
3       the war against the Soviet Union?

4           A     One of the facts, not the actual commencement  
5       of war however, but preparation for war.

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1           Q   By the way, was that sort of liaison  
2           mission from the Kwantung Army exceptional or  
3           uncommon in the Mongolia Occupation Army?

4           A   During my tenure of office it was unusual.

5           Q   How often did it happen during your tenure  
6           there?

7           A   All I can recall is that one occasion.

8           Q   Then, the next significant fact on which  
9           you base this conclusion is that one of your  
10          superiors told you to be sure to have your code  
11          books ready for use in case of need. And as I  
12          understand it, that was evidence to you that an  
13          aggression was planned.

14          A   That is so.

15          Q   I take it that in case of a defensive  
16          war against the Soviet Union you wouldn't have  
17          needed code books, would you?

18          A   What is your meaning?

19          Q   I mean that you have said that the  
20          preparation of code books is evidence to your mind  
21          that aggression was planned, and I am asking you  
22          if these code books would not have been needed  
23          equally     in the event of a defensive war with  
24          the Soviet Union.

25           THE PRESIDENT: We know code books are

1 required in any war, defensive or offensive.  
2  
3 MR. BLAKENEY: Of course, I am not trying  
4 to prove the facts, your Honor. I am trying to  
5 prove the type of opinion that man formed and evidence  
6 upon which he is willing to come in here and give  
7 those opinions, and I think it only fair to say that  
8 if a man comes in here to swear away a man's life  
9 on this type of affidavit, it is due the defense  
10 to be allowed to investigate the basis for his  
statements, whether of fact or of opinion.

11 THE PRESIDENT: Yes, but what we are  
12 concerned about, Mr. Blakeney, is to have the  
13 questions of counsel confined to those that are  
14 likely to be really helpful. I keep repeating that  
15 because I know that is what my Colleagues are  
16 looking for. We are all looking for that.

17 MR. BLAKENEY: I haven't the slightest  
18 wish to offend, but I do want to point out that  
19 when these affidavits are admitted containing  
20 material of this sort, we cannot know what part of  
21 it will be given weight and what part will not.

22 THE PRESIDENT: We do not want you to take  
23 up time putting questions where comment would suffice,  
24 and by comment I mean matter that could well be  
25 referred to in summation. You are right in saying

that you don't know just what effect this witness' evidence is going to be given by any Member of the Tribunal. Nevertheless, I do feel that he is not nearly as important as many who have given evidence and who will be expected to give evidence. And yet we are spending a lot of time on the cross-examination. It is a matter of judgment, Major Blakeney, and all I can say is what I have said now. I do not propose to say any more about it.

MR. BLAKENEY: I do want your Honor to know that I am not attempting anything like a filibuster, but these are the three witnesses whom the Soviet prosecution have thought sufficiently important to bring and we think them sufficiently important to cross-examine thoroughly.

COLONEL IVANOV: Your Honor, I want to call the attention of the Tribunal to the fact that Mr. Blakeney in his line of questioning is artificially dividing minor and major facts stated in his affidavit into episodes -- into separate episodes. Devoting most attention to the examination of minor facts, he is trying to tie them up with the conclusions that he is drawing himself with regard to the aggression which Japan was preparing against the U.S.S.R. I submit that to continue this line of questioning

would be a waste of time and if it is advisable  
1 to continue this cross-examination, then it should  
2 be done on the basis of the estimation of facts  
3 stated by the witness in his affidavit, without  
4 splitting them into minor episodes.

THE PRESIDENT: It is still a matter of  
6 judgment; what is major and what is minor.  
7

8 Yes, Major Blakeney, proceed with your  
9 cross-examination.

10 BY MR. BLAKENEY (Continued):

11 Q Well, here is another captain, one TSUBOI,  
12 who told you all about the exploration of the  
13 Feisuantaiku Desert. Was he an operations officer?

14 A No.

15 Q What was he?

16 A He was the commander of the research party.

17 Q Of the exploration party, that is?

18 A Yes.

19 Q Wasn't that expedition under the command  
20 of an intelligence officer?

21 A Yes.

22 Q Well, now, how do you determine that an  
23 expedition for gathering information or intelligence  
24 was either for aggression or for defense?

25 A I gained that impression from army reports

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1 received at the time -- on the situation of the  
2 army.

3 Q Reports from whom?

4 THE MONITOR: Not "reports." That was  
5 corrected to "the situation of the army."

6 Q Oh, I am sorry.

7 If an intelligence officer commanded the  
8 party, would that suggest to you that the party had  
9 any connection with operations plans then in existence?  
10 I should have said that it necessarily had such a  
11 connection.

12 A Since the commander of the party was a  
13 staff officer of the army in charge of intelligence,  
14 I believe he must have been connected with operations.

15 Q Didn't you tell us just a few minutes ago  
16 that there was a considerable distinction between  
17 intelligence and operations?

18 A Well, of course, as far as the actual  
19 duties of the respective sections went, I suppose  
20 there was a difference.

21 Q Well, at any rate, you are not suggesting,  
22 are you, that this party of exploration committed  
23 any attack on the Soviet Union?

24 A Of course, it is as you say.

25 THE PRESIDENT: We will adjourn until

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1 half-past nine tomorrow morning.

2 (Whereupon, at 1600, an adjournment  
3 was taken until Wednesday, 29 October 1947,  
4 at 0930.)

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